

5.3 PRIORITIZING LOCAL ASSISTANCE

The 44 CFR 201.4 (c)(4)(iii) requires states to include criteria for prioritizing communities and local jurisdictions that would receive planning and project grants under available funding programs. The criteria should include consideration for communities with the highest risks, repetitive loss properties, and most intense development pressures. The plan also needs to include a principal criterion for non-planning grants based on the extent to which benefits are maximized according to a benefit cost review.

The State of Ohio, recognizing the need for mitigation activities, supports planning efforts by encouraging local jurisdictions to submit potential projects add to support. Local jurisdictions are the focal point of the effort since they are most aware of the problems of their residents and areas within their communities. The effects of hazard events emphasize the need for mitigation projects. When grant money is available, the local jurisdictions complete applications to heighten the state's awareness of potential opportunities to reduce the risk from natural hazards. This section includes a description of the types of grant programs available and the prioritization process used to distribute funds.

The SHMO, in coordination with the SHMT, is responsible for the review, ranking and selection process of all projects. Representatives from the following agencies/ organizations are permanent members of this team:

- OEMA
- Department of Development, Office of Community Partnerships
- Department of Natural Resources, Division of Water
- State and Local Government Commission
- Emergency Management Association of Ohio (EMAO)
- Army Corp of Engineers
- US Fish and Wildlife
- US Environmental Protection Agency
- Ohio Public Works Commission

Additional State Agency representatives are determined by the nature of the projects and appropriate Federal agencies may also be asked to help review the merits of a certain type of projects.

The DMA2K requires that all jurisdictions requesting planning and project grant funding for mitigation programs must have an approved Local Mitigation Plan. The SHMT requires an approved Plan as the initial criteria for prioritizing all projects, regardless of program type. 44 CRF 201.6 as amended includes a one-year extension provision, which allows communities to complete their Local Mitigation Plan while maintaining eligibility for program funding. Communities with approved plans or that have initiated planning process and provide an approvable plan within a year, move into the next phase of the prioritization process. The one-year extension

does provide a sufficient amount of time for communities that submit a project, but haven't begun the planning process to create and secure plan approval.

Jurisdictions with an approved document are eligible for mitigation funding. The current PDM, HMGP and FMA programs have differing criteria for ranking projects during the selection process, but all programs place an emphasis on those communities with the greatest hazard risk.

5.3.1 NON-FEDERALLY FUNDED PLANNING AND PROJECT GRANTS

The State Capabilities section 4.2 highlighted State Agencies and other non-federal funding sources available for mitigation projects. The amount of funding and eligibility requirements from the funding sources varies but the objective, loss reduction and prevention, remains the same. The individual agencies funding the projects are responsible for prioritization of projects, but the SHMO and SHMT are available to provide recommendations and assistance with the process.

The minimum recommendations include:

- Willingness and ability of the community to complete projects
- Participation and good standing in the NFIP
- Projects support goal of reduction or elimination of hazard effects
- Projects are cost-beneficial
- Projects consider environmental issues
- Priority is given to communities at high-risk from the specified hazard

5.3.2 FEDERALLY FUNDED PLANNING RELATED GRANTS

A Community utilizes mitigation planning to identify hazards and assess vulnerability. The planning process provides a community with information on how to minimize or eliminate the effects of hazards and which areas are most vulnerable to damage. The primary federally funded grant programs the OEMA administers are HMGP, FMA and PDM. The goal of each program, to reduce loss of life and property due to natural disasters, is the same but the requirements vary. The SHMT, recognizing the variance, utilizes a different prioritization criterion for each grant program.

5.3.2.1 Flood Mitigation Assistance

FEMA Headquarters determines FMA target allocations for planning grants at the beginning of each fiscal year. Ohio receives limited funding from FEMA for mitigation planning grants through this program. The minimal funding requires the state to focus the grant funding on individual counties most at risk for flooding and flood damage. The SHMO and the OEMA Mitigation Branch staff identify communities with the highest priority for planning grants through an assessment of flood issues that impact the State. The main criteria used for prioritization are:

- Participation and good standing in the NFIP;

- Evidence of imminent flood issues;
- Number of repetitive loss structures in the community;
- Willingness and ability to complete the planning process and utilize the information for future projects, and
- Priority is given to communities at high-risk from flooding

An approved Flood Mitigation Plan is required for a community to receive any FMA project funds. A multi-jurisdictional organization can apply for a planning grant to develop a Flood Mitigation Plan, but the plan must be specific enough for local communities to be able to adopt and enforce it. The Flood Mitigation Plan should include the following:

- Discussion of repetitive loss structures and objectives for their reduction;
- Changes in the characteristics of the floodway or floodplain brought about by a flood or other disaster;
- Changes in population, land use, or development;
- Changes in community goals or priorities;
- Unanticipated changes in the floodway or floodplain due to development in the area; and
- Advances in flood-mitigation knowledge, strategies, or technologies.

Planning is imperative since the SHMO and Mitigation Branch Staff utilize the information from the Flood Mitigation Plan to prioritize projects from communities with extensive flood problems.

5.3.2.2 Hazard Mitigation Grant Program 7% and Pre-Disaster Mitigation Planning Grants

Ohio allocates 7% of the HMGP funds and PDM planning funds to local jurisdictions for assist with the planning process. The State recognizes that planning is crucial for achievement of mitigation actions, so any jurisdiction requesting funds to supplement the local mitigation planning process is able to receive funding through these programs until the SHMO, as administrator, has utilized all available funding. The amount of funding varies by jurisdiction. The HMGP and PDM funds are divided into two portions. Half the funds are distributed equally to local communities for planning and development of Local Mitigation Plans. A population-based distribution system, for the other half of the funds, ensures that larger communities with the most development pressure receive adequate funds to meet the planning requirements.

5.3.3 FEDERALLY FUNDED PROJECT RELATED GRANTS

Project identification can come from a variety of sources. Local jurisdictions and County Emergency Managers are best able to recognize project areas. As part of the updating process, the SHMO has the opportunity to identify potential mitigation projects by reviewing the existing State Hazard Mitigation Plan, past mitigation

recommendations and local hazard mitigation plans. FSHMT may be formed to participate during the preliminary damage assessment. Information acquired during this assessment process could also identify potential projects.

Communities that have identified projects are required to submit pre-applications as the initial step for participation in the program. The SHMT selects community projects from the pre-applications according to the established criteria for each type of grant program within 45 days of submission of all pre-applications. Selection by the SHMT triggers the project development process requiring the completion of a more detailed application. The information from the extended application allows the SHMT to prioritize grants and maximize benefits.

All programs, regardless of type, must be cost beneficial. The project should not cost more than the anticipated value of the reduction in both direct damages and subsequent negative impacts to the area if future hazardous events were to occur. Both costs and benefits should be computed on a net-present-value basis.

5.3.3.1 Flood Mitigation Assistance Project Grants

FMA provides funding to assist States and communities in implementing measures to reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes, and other structures insurable under the NFIP. The State's allocation is based on the number of flood insurance policies in force and the number of repetitive loss structures. The weight given to each of these factors in figuring the total target allocation for each State is determined annually. Only projects for mitigation activities specified in an approved Flood Mitigation Plan are eligible for project grants.

FMA project grants are prioritized by the SHMT based on the following criteria:

- The Community participates and is in good standing with the NFIP;
- Project includes repetitive loss properties and benefits community by reducing flood damages;
- Project conforms with goals and objectives listed in the Flood Mitigation Plan;
- Project is cost-effective and technically feasible;
- Priority is given to communities at high-risk from flooding;
- Project conforms with applicable Federal and State regulations and executive orders; and
- Benefit-cost ratio of at least 1.0.

The State receives limited funding for FMA projects. The SHMO utilizes FMA funds for individual small-scale projects and projects that had been approved through the HMGP process and meet all the above criteria, but were not completed due to lack of funding. The remaining HMGP projects funded through this program are prioritized according to HMGP requirements. The individual small-scale projects are prioritized on a case-by-case basis by the SHMO. Willingness and ability of the community to complete projects are taken into consideration.

5.3.3.2 Hazard Mitigation Grant Program Grants

Funds for HMGP projects rely on disaster declarations. Initial priority for project development post-disaster is three-tiered. First priority is given to communities within the declared or impacted area with an approved mitigation plan. Repetitive loss communities in non-declared counties with an approved mitigation plan are given second priority and third priority is all other communities with approved mitigation plans.

The prioritization process for HMGP projects is similar to FMA. Evaluation is based on two types of criteria: NFIP compliance and a list of objectives. The DNR evaluates each community according to NFIP/ Floodplain Management criteria. A community must receive at least 55 out of 100 points to qualify for funding. The SHMT evaluates each project according to the additional objectives worth another 100 points. The objectives for each criterion are listed below:

- Community has utilized all available resources;
- Project reduces the economic hardship to property owners and community;
- Project restores floodplains and wetlands and coastal management zones;
- Project increases public awareness of hazards, preventative measures, and emergency response to hazards;
- Project has multiple objectives such as damage reduction, environmental enhancement and economic recover;
- Project fits the overall plan for development and/or mitigation in the community;
- Project promotes economic growth and community development;
- Project promotes development of recreational areas/historical areas;
- Priority is given to communities at high-risk from the specified hazard;
- Project provides flood protection beyond the 100-year flood event; and
- Benefit cost ratio of at least 1.0.

DNR evaluates the projects prior to the SHMT meeting. The scores are not revealed until all projects have been evaluated, unless a community has less than 55 points. Once the projects have been evaluated, the total points are determined by totaling the points from the NFIP evaluation and the point assigned from the list of objectives. Projects are forwarded to FEMA according to their rank starting with the highest, proceeding down the list until all available funds have been committed. Those projects not selected for funding are forwarded to FEMA for approval with the stipulation that if additional funds become available they will be approved and funded.

The state may utilize up to 5% of total HMGP funds for non-technically proven projects that would not normally be funded under the program. Projects may be for, but are not limited to, research and development; generators for non-critical facilities;

development of codes and standards; education/ public awareness programs with mitigation as a central feature. Hazard warning systems, sirens and NOAA weather radios may be eligible if the declaration includes a tornado event. Projects funded through this initiative are determined on a case-by-case basis by the SHMT.

5.3.3.3 Pre-Disaster Mitigation Project Grants

The Pre-Disaster Mitigation Program is nationally competitive. Funding for the program is provided through the National Pre-Disaster Mitigation Fund to assist States and local governments in implementing cost-effective hazard mitigation activities that complement a comprehensive mitigation program. States submit projects to FEMA and all projects are prioritized under a National Evaluation system. Funds are distributed to communities that have the willingness and ability to complete projects and meet all National requirements. The National Evaluation criteria include:

- Projects list the community's prioritized initiatives;
- Eligibility of Applicants and sub-applicants;
- Eligibility of proposed activities and costs;
- Eligibility and availability of non-federal cost share;
- Feasibility of mitigation projects;
- Benefit cost ratio of at least 1.0 for mitigation projects, including substantially damaged structures;
- Technical accuracy, complete supporting documentation and source credibility of the BCA;
- Priority is given to communities at high-risk from the specified hazard;
- Complete responses to the Environmental/ Historical Preservation Established Questions and supporting documentation for mitigation projects; and
- Complete responses to Supplemental Questions for National Ranking and Evaluation.

The OEMA, as administrator, supplements any remaining HMGP projects with PDM funds. Prior to submitting the projects for National Evaluation, the projects are prioritized by the SHMO and SHMT according to the State HMGP evaluation criteria.